

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 15-MJ-06087-MPK
)	
SHANE GUNN)	

JOINT MOTION TO CONTINUE PROBABLE CAUSE HEARING

Defendant, Shane Gunn, and the United States Government, by and through their respective attorneys, hereby move that the probable cause hearing, now scheduled for October 19, 2015, be continued to October 26, 2015 or to another date thereafter convenient to the Court. As reason for this request, the parties anticipate that the matter will be resolved by agreement and a plea to an Information. The parties, however, require a short period of time to finalize the agreement and file the Information. The defendant consents to this continuation pursuant to Fed. R. Crim. P. 5.1(c) & (d), and the parties agree that the period of time commencing on October 19, 2015 and concluding on the next scheduled date for probable cause hearing is excludable under the Speedy Trial Act.

WHEREFORE, the parties respectfully submit that good cause exists to continue this matter and request that this Court continue the probable cause hearing to October 26, 2015 or a date thereafter convenient to the Court.

SHANE GUNN

By His Attorney,

/s/ Timothy Watkins
Timothy G. Watkins
Federal Defender Office
51 Sleeper St., Fifth Floor
Boston, MA 02210
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CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 15, 2015.

/s/ Timothy G. Watkins
Timothy G. Watkins